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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Eastern Industries, LLC, a New York
limited liability company,

Plaintiff,

v.

EarthCo Enterprises, LLC, an Arizona
limited liability company; Thomas Vella
and Jane Doe Vella, husband and wife,
Wesley Zlotoff and Jane Doe Zlotoff,
husband and wife; Dominic Riccobono and
Jane Doe Riccobano, husband and wife,
and Jack Thomas Riccobono and Jane Roe
Riccobono, husband and wife, Scott
Williams and Jane Doe Williams, husband
and wife,

Defendants.

Case No. 2:23-cv-00109

**STIPULATION TO AMEND CASE
MANAGEMENT ORDER**

(Assigned to the Hon. Susan M. Brnovich)

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, the undersigned Parties hereby jointly agree, stipulate, and request to amend the Case Management Order to allow the Parties additional time to engage in discovery, exchange relevant documents, review disclosed information, respond to written discovery, and take depositions. Since new counsel for Plaintiff made their appearance earlier this year, the Parties have been

1 working on the aforementioned discovery issues, but more time is needed. The Parties
2 request that the Court amend the Case Management Order by extending the fact
3 discovery deadline by sixty (60) days and the other remaining deadlines by thirty (30)
4 days. This extension request is made in good faith and not for any dilatory purposes or
5 for delay. A proposed order is filed herewith.

6 DATED this 30th day of April 2025.

7 **WARNER ANGLE HALLAM**
8 **JACKSON & FORMANEK PLC**

9 By: /s/ Peter J. Foster
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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF filing system, and that on said date copies were delivered electronically via the CM/ECF filing system to:

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